

Renee L. McCray  
c/o 109 North Edgewood Street  
Baltimore, Maryland 21229

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AT BALTIMORE  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

BY

DEPUTY

November 2, 2018

Judge A. David Copperthite  
United States District Court  
101 W. Lombard Street, 4<sup>th</sup> Floor  
Baltimore, Maryland 21201  
Attn: Clerk of the Court

RE: McCray v. Samuel I. White, et al.  
Civil Action No. 13-cv-1518-ADC

Dear Judge Copperthite:

Today, I received two Orders from you dated 10/31/2018. Pursuant to your Order concerning filing motions, I am submitting this letter explaining the basis for the Motion to Compel Defendants to Respond to Plaintiff's First Set of Discovery Request, I filed on Monday, October 29, 2018 and the Motion to Compel Defendant Driscoll to Respond to Plaintiff's Second Set of Discovery Request, that was mailed on Tuesday, October 30, 2018; and was received according to the USPS on November 1, 2018.

In each of these Motions, Plaintiff tried to resolve the discovery disputes without the Court's intervention by scheduling depositions in order to receive the documents related specifically to Plaintiff's allegations in the 4<sup>th</sup> Amended Complaint. As Plaintiff stated in each of the Motions, Mr. Hillman again refused to provide the Plaintiff with the requested documentation. In the interest of resolving these discovery disputes, the Plaintiff hereby is requesting assistance from the Court as outlined in each of the Motions. As you can see the discovery requests, for each Motion, are proper and are within the four corners of the Plaintiff's 4<sup>th</sup> Amended Complaint.

Further, the Plaintiff is also requesting assistance from the Court for Plaintiff's 3<sup>rd</sup> Set of Discovery Requests, which Plaintiff was in the process of filing with the Court next week because of Mr. Hillman's continued dilatory tactics as outlined in Plaintiff's Response in Opposition to Defendants Conditional Consent (Doc. 138). Mr.

Hillman has not responded to the Plaintiff's request to schedule a telephone conference to confer regarding discovery disputes for Defendants Driscoll, Gantt, Reynolds and SIWPC (see ANNEX A). Mr. Hillman is again attempting to delay the discovery process in order to inhibit the Plaintiff's ability to obtain discoverable and usable evidence. Plaintiff believes Mr. Hillman would not consistently engage in these stall tactics, if she had an attorney to represent her. Therefore, the Plaintiff is requesting permission from the Court to file a third Motion to Compel in order to receive proper responses for the preparation of the Plaintiff's case.

Sincerely,

A handwritten signature in black ink, appearing to read "Renee L. McCray", with a stylized flourish at the end.

Renee L. McCray,  
Plaintiff

Enclosures: ANNEX A

cc: Robert H. Hillman